

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

TREVOR KEVIN BAYLIS,

Plaintiff, (*pro se*).

v.

VALVE CORPORATION,

Defendant.

Case No. 2:23-cv-01653-RSM

**DECLARATION OF BAYLIS
IN SUPPORT OF PLAINTIFF'S
RESPONSE TO VALVE'S MOTION
TO REFER COPYRIGHT
REGISTRATION QUESTIONS TO
THE REGISTER OF COPYRIGHTS
AND FOR STAY OF PROCEEDINGS**

Date filed 10th April 2024

I, Trevor Kevin Baylis, declare as follows:

1. I am a professional 3D artist and animator. I represent myself as Plaintiff ("Baylis") in this matter. I am fifty six years old and have personal knowledge of the facts stated below. I am otherwise competent to testify and, if called upon to testify on the matters herein, would do so consistently with this declaration.

2. Attached hereto as **Exhibit A** is a true and correct copy of Director Timo Vuorensola's comments regarding the Finish Market Court Case "MAO302/18" from Iron Sky Producers official web site, (<https://web.archive.org/web/20181004123920/http://ironsky.net/2018/08/01/the-iron-sky-struggle-part-3-the-final-countdown/>) (Accessed 10th April 2024)

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Wherein it is admitted by “Defendants” in MAO302/18 words to the effect that Baylis did work on the film Iron Sky, and **a false claim by Defendants** that Baylis was working on a “work-for-hire” basis under a signed contract.

“As the defendants, we argued that while they did work on the film, they were working on a work-for-hire basis, under a signed contract” (Iron Sky Director Timo Vuorensola)

2. Attached hereto as **Exhibit B** is a true and correct copy of email exchanges Baylis had with Saskia Florence, Supervisory Registration Specialist, Performing Arts Division, Motion Picture Team U.S. Copyright Office. (Copyright Office <cop-ad@loc.gov> 26 Sept 2023, 22:36). Wherein Ms Florence specifically instructs Baylis to base his registration on United States Copyright law whilst assuring him she understands that foreign laws may be different. “Please note that an application for copyright registration must be filed according to the U.S. Copyright law. I understand that in other countries, copyright law and work made for hire can be quite different.” (Saskia Florence)

3. Attached hereto as **Exhibit C** is a true and correct copy of a Machine Translation of Pirkanmaa District Court case in Finland Baylis v Troll VFX, L15/32468 wherein Baylis has proven his authorship to his Iron Sky works in front of Judge Oskar Kulmala who wrote, “In relation to the aforementioned animations, Baylis has shown, for example, regarding Maya files K21, K27 and K28, which are evidence, that numerous and numerous files and meta-files have his name, i.e. he was the author of the animations.” (Judge Oskar Kulmala page 11 (Baylis_11))

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4. Attached hereto as **Exhibit D** is a true and correct copy of a recent email exchange Baylis had with Finnish Lawyer Petri Eskola who represented Baylis and other plaintiffs in MAO302/18 wherein he confirms that there was no actual dispute in MAO302/18 about Moral rights (The right to claim authorship) under section 3 of the Finnish copyright act.

“Hi Trev,

indeed, I can confirm that moral rights were not an issue at all in Market Court proceedings, but only economical rights.

Petri” (Email from Petri Eskola <petri.eskola@backstrom.fi> 08 April 2024).

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed in Tampere, Finland on this 10th day of April, 2024.

Trevor K Baylis

¹ “¶” citations are to Second Amended Complaint (“SAC”) Dkt. #25 unless otherwise indicated.

CERTIFICATE OF SERVICE FORM

FOR ELECTRONIC FILINGS

I hereby certify that on 10th April 2024 I electronically filed the foregoing document
with the United States District Court

Western District of Washington at Seattle by using the
CM/ECF system. I certify that the following parties or their counsel of
record are registered as ECF Filers and that they will be served by the

CM/ECF system:

Jeremy E Roller: jroller@aretelaw.com,

jfischer@aretelaw.com,

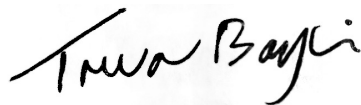
kgreenberg@aretelaw.com

Jonah O. Harrison: jharrison@aretelaw.com,

jfischer@aretelaw.com,

kgreenberg@aretelaw.com

Dated: 10th April 2024

A handwritten signature in black ink, appearing to read "Trevor Baylis", written over a light gray rectangular background.

Trevor Kevin Baylis

Jankanraitti

Tampere 33560, FINLAND

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